

In the Matter of)
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)
) RM-11347
Changes in Part 97)
With regard to Amateur)
Radio Service Rules,)
97.119(a) Station Identification)

To: The Commission

Comments by Donald B. Chester

1. Introduction

Continuously licensed since 1959, I have held an Amateur Extra Class operator licence since 1963. My amateur radio call sign is K4KYV. My comments are as follows.

Mr. Glen E. Zook is petitioning for changes to 47 CFR Part 97 Section 97.119(a), which addresses the requirements for the identification of radio stations operating in the Amateur Service by the control operator.

The wording of the present Section 97.119(a) is the result of PR Docket 88-139, which was released in 1988, and which consisted of a complete rewrite of Part 97 rules, which govern the Amateur Radio Service in the United States. The reason for the rewrite was stated by the Commission in the original NPRM, as quoted in part below:

“3. We wish to recognize and encourage the experimental nature of the amateur service. It is appropriate to avoid... placing in the rules detailed regulations and specifications for the ... operation of various amateur communications systems. Such regulations... would reduce the flexibility that is a hallmark of a service free to branch out and follow an infinite number of paths... Our regulatory approach is to state the basic requirements that each amateur operator and station must observe.”

Mr. Zook maintains that Section 97.119(a), as rewritten, has led to confusion in the rules concerning correct identification procedures. He cites the regulations as written in the old Part 12, which governed the Amateur Radio Service many years ago, as having “spelled out” in relatively concise terms that did not allow for “interpretation” as to what were identified and

unidentified transmissions. In his petition, he proposes to return the wording of Section 97.119(a), to that of the old Section 12.82 (a).

2. Amateurs would be required to transmit the callsign(s) of station(s) being communicated with.

Mr. Zook's proposed amendment to the rules would change the basic procedure amateur operators use to identify their stations. The present rules require only that each amateur station must transmit its assigned call sign at the end of each communication, and at least every 10 minutes during a communication. Mr. Zook proposes requiring each station to transmit the call sign of the station(s) being called or communicated with, followed by the words "this is" or "from", or in the case of CW the prosign "de," to be followed by the call sign of the station transmitting, at the beginning and at the end of each single transmission or series of short transmissions.

Requiring amateur stations to transmit the call sign of the station being communicated with, would serve no useful purpose in terms of the Commission's stated purpose of the rule: of "clearly making the source of the transmissions from the station known to those receiving the transmissions."

This would make amateur identification procedure more cumbersome, and in some cases, would result in more interference during amateur communications. When a large number of stations attempt to contact a distant station, for example during a contest or when wishing to contact a foreign station, the standard procedure is for the operator to transmit his/her assigned call sign. Sometimes dozens of stations continue to simultaneously transmit their call signs until the distant station acknowledges one or more of the calling stations. If each of the calling stations were required to transmit the call sign of the distant station, followed by "this is," "from," or "de," in addition to the stations own assigned call sign, the result would be far more chaotic and the interference would be greater.

In the case of net operation, or large groups or roundtables in communication, requiring each station in the group to transmit the call sign of every other station in the group in addition to the station's own call sign, would result in confusion, interference, and wasted time at each station identification. During net operation, the net control could be considered the station being communicated with. But during large informal roundtables, there is no "net control" station.

Under old Part 12, confusion over exactly what the Commission required under this rule led to confusion and debate amongst amateur operators for many years. This was undoubtedly one of the reasons the Commission simplified the rule under PR Docket 88-139.

3. Unidentified communications or signals

Mr. Zook correctly points out that at some time during the initial transmission (unless the transmission is in excess of 10 minutes in length), the assigned call sign of the transmitting station must be given. This is already clear from the wording of the present rule. That many stations, especially when operating via FM repeaters, do not properly identify, is not a result of the wording of the identification rule, but a result of individual operators' failure to observe the existing rule.

In one situation, unidentified transmissions during amateur communication may be the result of the simplification of the identification rule. Section 97.119(a) states that an amateur station must transmit its call sign "at the end of each communication, and at least every 10 minutes during a communication." A station could possibly begin transmitting and continue for as long as 10 minutes before initially identifying. The station could communicate with another station during a series of short transmissions over a period of 10 minutes before identifying. Therefore, each of the initial short transmissions could be interpreted as an "unidentified transmission," but this is not a problem unless the transmitting station fails to eventually identify before the initial 10-minute period has passed. In the latter case, the station has simply failed to comply with the identification rule as it already exists, and this is not a result of ambiguity in the wording of the rule.

The Canadian Amateur Service rules state that "The operator of any amateur station shall transmit the applicable identification ..., at the beginning and at the end of each period of exchange of communication or test transmission, and at intervals..."

The UK Amateur Services rules state that the operator shall transmit the applicable identification:

- “(a)during initial calls (“CQ” calls) or calls to establish contact with another Amateur;
- (b) at least once during each transmission and additionally when the period of transmission is longer than 15 minutes, at the end of each transmission;
- (c) at least once every 15 minutes during net operations;
- (d) whenever the frequency of transmission is changed, at the beginning of transmission on the new frequency;”

This ambiguity could easily be corrected in Section 97.119(a) of the U.S. amateur rules by simply inserting a four-word phrase, so that the section reads, “Each amateur station, except a space station or telecommand station, must transmit its assigned call sign on its transmitting channel **at the beginning and** at the end of each communication, and at least every 10 minutes during a communication...”

4. Conclusion

The existing identification requirements, as prescribed in Section 97.119(a) of the Amateur Radio Service rules, adequately fulfil the stated purpose of clearly making the source of the transmissions from the station known to those receiving the transmissions. I do not believe there is any significant need to make changes to the existing rules. Unidentified transmissions that may occur are the result of failure to observe the rules as they exist, not the result of ambiguity in the wording of the present rules.

However, the identification requirement could be further clarified by changing beginning of the first sentence of Section 97.119(a) to read as follows:

“Each amateur station, except a space station or telecommand station, must transmit its assigned call sign on its transmitting channel at the beginning and at the end of each communication, and at least every 10 minutes during a communication, for the purpose...”

Requiring an amateur station to transmit the call sign(s) of the station(s) being called or communicated with during station identification would make the identification procedure unnecessarily cumbersome, would serve no useful purpose, and would contribute to confusion and additional interference during the course of amateur radio communications.

Respectfully submitted,

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